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Executive Director

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August 7, 2024

**BY ECF**

Honorable John G. Koeltl  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Troy Carter, 24 Cr. 310 (JGK)**

Honorable Judge Koeltl:

I write to respectfully request that the Court modify Mr. Carter's conditions of release to remove the curfew with electronic monitoring which is currently in place. Pretrial Services has no objection to the removal of curfew with electronic monitoring, and the Government defers in this request to Pretrial Services.

Mr. Carter has been in compliance with all of his conditions of release and has recently obtained hourly employment with a variable schedule that changes on short notice. In turn, this has required Mr. Carter to seek approval from Pretrial Services to leave his home outside of curfew hours with short notice. In addition, Mr. Carter has extensive child care obligations and is caring for his mother who recently underwent two surgeries.

I have discussed this request with AUSA Adam Margulies, who defers to Pretrial Services. I have also extensively discussed this request with Pretrial Services Officer Francesca Piperato, who has no objection to the requested modification.

Accordingly, I respectfully request that Mr. Carter's conditions of release be modified to remove the condition of a curfew with electronic monitoring.

Thank you for your consideration of this matter.

Respectfully submitted,  
/s/  
Christopher Flood, Esq.  
(212) 417-8734

**SO ORDERED:**

8/8/24



**HONORABLE JOHN G. KOELTL**  
United States District Judge

cc: AUSA Adam Zeldes Margulies (by ECF)  
US PTSO Francesca Piperato (by email)